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13 – and –

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24 13 Co-Lead Counsel for Plaintiffs

25 14 [Additional counsel appear on signature page.]

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16 UNITED STATES DISTRICT COURT
17 NORTHERN DISTRICT OF CALIFORNIA
18 OAKLAND DIVISION

19 In re NVIDIA CORP. DERIVATIVE) Master File No. C-06-06110-SBA
20 LITIGATION)
21 _____) STIPULATION AND ~~PROPOSED~~ ORDER
22 This Document Relates To:) REGARDING FILING OF CONSOLIDATED
23 ALL ACTIONS.) COMPLAINT
24 _____)
25
26
27
28

1 This Stipulation is entered into by and among plaintiffs and nominal defendant NVIDIA
2 Corp. ("NVIDIA") and defendants Jen-Hsun Huang, Marvin D. Burkett, Chris A. Malachowsky,
3 David M. Shannon, Ajay K. Puri, Daniel F. Vivoli, Jeffrey D. Fisher, Brian M. Kelleher, Steven
4 Chu, Tench Coxe, James C. Gaither, Harvey C. Jones, William J. Miller, Mark L. Perry, A. Brooke
5 Seawell, Christine B. Hoberg, Curtis R. Priem, Di Ma, Mark L. Stevens and Mary Dotz through their
6 attorneys of record.

7 WHEREAS, on January 25, 2007, the Court ordered that plaintiffs shall file a Consolidated
8 Complaint by February 20, 2007; and

9 WHEREAS, plaintiffs have requested an extension from February 20, 2007 to February 28,
10 2007 to file and serve the Consolidated Complaint; and

11 WHEREAS, defendants do not object to such an extension of time.

12 THEREFORE, the undersigned parties stipulate as follows:

13 1. Plaintiffs shall file and serve the Consolidated Complaint by February 28, 2007.

14 IT IS SO STIPULATED.

15 DATED: February 20, 2007

LERACH COUGHLIN STOIA GELLER
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BENNY C. GOODMAN III
MARY LYNNE CALKINS

s/ Travis E. Downs III
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23 Co-Lead Counsel for Plaintiffs

24 *I, Travis E. Downs III, am the ECF user whose ID and password are being used to file this
25 Stipulation and [Proposed] Order Regarding Filing of Consolidated Complaint. In compliance with
26 General Order 45, X.B., I hereby attest that James N. Kramer has concurred in this filing.*

27 DATED: February 20, 2007

28 ORRICK, HERRINGTON & SUTCLIFFE LLP
JAMES N. KRAMER
RICHARD GALLAGHER
MICHAEL D. TORPEY

29 _____
30 s/ James N. Kramer
31 JAMES N. KRAMER

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37 Attorneys for Defendants

1 I, Travis E. Downs III, am the ECF user whose ID and password are being used to file this
2 Stipulation and [Proposed] Order Regarding Filing of Consolidated Complaint. In compliance with
General Order 45, X.B., I hereby attest that Karin Kramer has concurred in this filing.

DATED: February 20, 2007

HOWREY LLP
KARIN KRAMER
LEIGH A. KIRMSSE

s/ Karin Kramer
KARIN KRAMER

525 Market Street, Suite 3600
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Attorneys for Defendant Christine B. Hoberg

* * *

ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: 2/22/07

THE HONORABLE SAUNDRA B. ARMSTRONG
UNITED STATES DISTRICT JUDGE

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CERTIFICATE OF SERVICE

2 I hereby certify that on February 20, 2007, I electronically filed the foregoing with the Clerk
3 of the Court using the CM/ECF system which will send notification of such filing to the e-mail
4 addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I have
5 mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF
6 participants indicated on the attached Manual Notice List.

s/ Travis E. Downs III
TRAVIS E. DOWNS III

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Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

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